

FILED

December 17, 2021

**OFFICE OF
APPELLATE COURTS**

**STATE OF MINNESOTA
SPECIAL REDISTRICTING PANEL
A21-0243
A21-0546**

Peter S. Wattson, Joseph Mansky, Nancy B. Greenwood, Mary E. Kupper, Douglas W. Backstrom and James E. Hougas III, individually and on behalf of all citizens and voting residents of Minnesota similarly situated, and League of Women Voters Minnesota,

Plaintiffs,

and

Paul Anderson, Ida Lano, Chuck Brusven, Karen Lane, Joel Hineman, Carol Wegner, and Daniel Schonhardt,

Plaintiff-Intervenors

vs.

Steve Simon, Secretary of State of Minnesota; and Kendra Olson, Carver County Elections and Licensing Manager, individually and on behalf of all Minnesota county chief election officers,

Defendants,

and

Frank Sachs, Dagny Heimisdottir, Michael Arulfo, Tanwi Prigge, Jennifer Guertin, Garrison O'Keith McMurtrey, Mara Lee Glubka, Jeffrey Strand, Danielle Main, and Wayne Grimmer,

Plaintiffs,

**Declaration of Amy Erickson in
Support of the Corrie Plaintiffs'
Response to the Parties'
Congressional and Legislative
Redistricting Plans**

and

Dr. Bruce Corrie, Shelly Diaz, Alberder
Gillespie, Xiongpaoo Lee, Abdirazak
Mahboub, Aida Simon, Beatriz Winters,
Common Cause, OneMinnesota.org, and
Voices for Racial Justice,

Plaintiff-Intervenors,

vs.

Steve Simon, Secretary of State of
Minnesota,

Defendant.

I, Amy Erickson, declare as follows:

1. I am an attorney licensed to practice law in the State of Minnesota and am an attorney at the law firm of Lathrop GPM LLP. I am one of the attorneys representing the Corrie Plaintiffs in the above-captioned matter.
2. Following submission of the Corrie Plaintiffs' Redistricting Plans on December 7, 2021, the Corrie Plaintiffs realized that there was an error in their Senate block equivalency file that resulted in a non-contiguous district. The block equivalency file was revised the same day and resubmitted to the Panel. Attached to this Declaration are the revised Senate Reports that reflect the change made to the block equivalency file.
3. A true and correct copy of the Senate Population Summary Report is attached as **Exhibit A**.

4. A true and correct copy of the Senate Plan Components Report—Short Form is attached as **Exhibit B1**.

5. A true and correct copy of the Senate Plan Components Report – County is attached as **Exhibit B2**.

6. A true and correct copy of the Senate Plan Components Report – City/Town is attached as **Exhibit B3**.

7. A true and correct copy of the Senate Contiguity Report is attached as **Exhibit C**.

8. A true and correct copy of the Senate Political Subdivisions Splits Reports is attached as **Exhibit D**.

9. A true and correct copy of the Senate Minority Voting Age Population Report is attached as **Exhibit E**.

10. A true and correct copy of the Senate Measures of Compactness is attached as **Exhibit F**.

11. A true and correct copy of the Senate Community of Interest Report is attached as **Exhibit G**.

12. A true and correct copy of a Congressional block equivalency file that more closely satisfies the ideal population principle will be produced in its native format as **Exhibit H** and emailed to the Panel and the Parties at stateredistrictingpanel@courts.state.mn.us.

13. To aid the Panel, the Corrie Plaintiffs also submit additional political subdivision reports, showing splits of cities at the Congressional, Senate, and House level, as well as reports showing reservation splits at the Congressional, Senate, and House level.

14. A true and correct copy of a political subdivision report showing splits of cities at the Congressional level is attached as **Exhibit I**.

15. A true and correct copy of a political subdivision report showing splits of cities at the Senate level is attached as **Exhibit J**.

16. A true and correct copy of a political subdivision report showing splits of cities at the House level is attached as **Exhibit K**.

17. A true and correct copy of a report showing American Indian reservation splits at the Congressional level is attached as **Exhibit L**.

18. A true and correct copy of a report showing American Indian reservation splits at the Senate level is attached as **Exhibit M**.

19. A true and correct copy of a report showing American Indian reservation splits at the House level is attached as **Exhibit N**.

I declare under penalty of perjury that everything that I have stated in this declaration is true and correct.

Dated: December 17, 2021

/s/ Amy Erickson
Amy Erickson